

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America,

- v. -

Robert Hadden,

Defendant.

20 Cr. 468 (RMB)

DECLARATION OF DEIRDRE VON DORNUM

I, Deirdre D. von Dornum, hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney admitted in the State of New York and before this Court, and I am the Attorney-in-Charge of the Federal Defenders of New York, counsel for Robert Hadden in the above captioned case.
2. I submit this declaration in support of the defendant's pre-trial motions.
3. Attached hereto as **Exhibit 1** is a true and correct copy of an article, "Exclusive: New Evidence Shows a Patient Warned Columbia University About OB-GYN's Alleged Sexual Assault Decades Ago," published by CNN, 02/28/20, <https://www.cnn.com/2020/02/28/politics/columbia-sexual-assault-letter-warning-invs/index.html>;
4. Attached hereto as **Exhibit 2** is a true and correct copy of Tr. of Remote Telephone Conf. 09/17/20, published at ECF No. 9;
5. Attached hereto as **Exhibit 3** is a true and correct copy of an article, "A Doctor

Admitted to Sexually Abusing Patients and Then Walked Free,” published by BuzzFeed News on 06/05/18, <https://www.buzzfeednews.com/article/albertsamaha/robert-hadden-doctor-sexual-abuse-cy-vance>;

6. Attached hereto as **Exhibit 4** is a true and correct copy of Indictment, People v. Hadden, Indictment No. 2044/2014, published at ECF No. 20;
7. Attached hereto as **Exhibit 5** is a true and correct copy of Plea Agreement, People v. Hadden, Indictment No. 2044/2014, published at ECF No. 17;
8. Attached hereto as **Exhibit 6** is a true and correct copy of Plea Tr. 5:23-10:11, People v. Hadden, Indictment No. 2044/2014, ECF No. 16, dated 02/32/16;
9. Attached hereto as **Exhibit 7** is a true and correct copy of Affirm in Supp. of People’s Application for Order Permitting Admis. Evid. Prior Bad Acts and Uncharged Crimes of the Def., People v. Hadden, Indictment No. 2044/2014 (N.Y. Sup. Ct., Feb. 2, 2015);
10. Attached hereto as **Exhibit 8** is a true and correct copy of Sent’g Tr. 7:22-8:10, 10:14-15, People v. Hadden, Indictment No. 2044/2014, ECF No. 18, on 03/29/16;
11. Attached hereto as **Exhibit 9** is a true and correct copy of Letter from Katherine Hawkins, Bd. for Pro. Med. Conduct, to Robert A. Hadden, on 02/26/16, <https://apps.health.ny.gov/pubdoh/professionals/doctors/conduct/factions/FileDownloadAction.action?finalActionId=9851&fileName=BRD+184487.pdf&fileSeqNum=1>;
12. Attached hereto as **Exhibit 10** is a true and correct copy of an article, “ This Gynecologist Abused Patients for Two Decades — & He Avoided Jail Time Until Now,” published by Refinery29 on 09/18/20, <https://www.refinery29.com/en-us/2020/09/10035570/dr-robert-hadden-sexual-abuse-gynecologist-history-jail-time>;
13. Attached hereto as **Exhibit 11** is a true and correct copy of an article, “19 Women

Accused a Gynecologist of Abuse. Why Didn't He Go to Prison?" published by N.Y. Times on 10/22/19, <https://www.nytimes.com/2019/10/22/nyregion/robert-hadden-gynecologist-sexual-abuse.html>;

14. Attached hereto as **Exhibit 12** is a true and correct copy of an article, "Exclusive: Evelyn Yang Reveals She Was Sexually Assaulted by Her OB-GYN While Pregnant", published by CNN on 01/17/20, <https://www.cnn.com/2020/01/16/politics/evelyn-yang-interview-assault/index.html>;
15. Attached hereto as **Exhibit 13** is a true and correct copy of an article, "Evelyn Yang, Wife of Andrew Yang, Says She Was Assaulted by Her Gynecologist," published by N.Y. Times on 01/16/20, <https://www.nytimes.com/2020/01/16/us/andrew-evelyn-yang-dr-robert-hadden.html>;
16. Attached hereto as **Exhibit 14** is a true and correct copy of an article "Manhattan DA's Office Investigating New Assault Allegations Against Former Columbia OB-GYN," published by CNN on 02/21/2020, <https://www.cnn.com/2020/02/21/politics/hadden-columbia-investigation-invs/index.html>;
17. Attached hereto as **Exhibit 15** is a true and correct copy of an article, "Gynecologist Spared Prison in '16 Sex-Crime Plea Faces New Inquiry," published by N.Y. Times on 02/20/20 <https://www.nytimes.com/2020/02/20/nyregion/robert-hadden-investigation.html>;
18. Attached hereto as **Exhibit 16** is a true and correct copy of federal Indictment, ECF No. 1;

19. Attached hereto as **Exhibit 17** is a true and correct copy of Tr. of Remote Presentment held on 09/09/20;
20. Attached hereto as **Exhibit 18** is a true and correct copy of an article, “NY Doctor Charged in Serial Sexual Assaults on Patients,” published by Wash. Post on 09/09/20, https://www.washingtonpost.com/national/ny-doctor-charged-in-serial-sexual-assaults-on-patients/2020/09/09/e5752158-f2ab-11ea-8025-5d3489768ac8_story.html;
21. Attached hereto as **Exhibit 19** is a true and correct copy of a tweet published by Evelyn Yang (@EvelynYang) on 09/09/20, <https://twitter.com/EvelynYang/status/1303736907206135820>;
22. Attached hereto as **Exhibit 20** is a true and correct copy of an article “Evelyn Yang Shares Her Story of Childhood Sexual Abuse: ‘We Need to Be Normalizing These Conversations,’” published by People on 04/06/2021;
23. Attached hereto as **Exhibit 21** is a true and correct copy of a tweet published by Andrew Yang (@AndrewYang) on 04/05/21, <https://twitter.com/AndrewYang/status/1379157902133501954>;
24. Attached hereto as **Exhibit 22** is a true and correct copy of an article, “175 Patients of Former Gynecologist Have Signed on to Lawsuit Against Columbia University, Attorney Says,” published by CBS News, on 03/30/21, <https://www.cbsnews.com/news/attorney-says-175-patients-of-former-gynecologist-have-signed-on-to-lawsuit-against-columbia-university/>;
25. Attached hereto as **Exhibit 23** is a true and correct copy of the website of The DiPietro Law Firm, last visited 06/16/21, www.atdlaw.com;
26. Attached hereto as **Exhibit 24** is a true and correct copy of a promotional video,

“Abused by Dr. Robert Hadden? - Columbia University Scandal,” published on YouTube on 09/22/20, <https://www.youtube.com/watch?v=LKHyhXhFDi0/>;

27. Attached hereto as **Exhibit 25** is a true and correct copy of an article, “New York Gynecologist Indicted on Federal Charges of Sexually Assaulting Patients,” published by Wash. Post on 09/09/20, <https://www.washingtonpost.com/nation/2020/09/09/robert-hadden-sexual-assault-indictment/>;
28. Attached hereto as **Exhibit 26** is a true and correct copy of an article, “Sex Crime Accountability Group Names Three Top Candidates for Manhattan DA,” published by Politico on 04/14/21, <https://www.politico.com/states/new-york/albany/story/2021/03/14/sex-crime-accountability-group-names-three-top-candidates-for-manhattan-da-1368246>;
29. Attached hereto as **Exhibit 27** is a true and correct copy of an article, “‘The Most Good for the Most People’: Leading Sex Crimes Justice Advocate backs Bragg for DA”, published by Politico on 05/03/21, <https://www.politico.com/states/new-york/city-hall/story/2021/05/03/the-most-good-for-the-most-people-leading-sex-crimes-justice-advocate-backs-bragg-for-da-1379688>;
30. Attached hereto as **Exhibit 28** is a true and correct copy of an article, “NYC Council Passes Bill to Allow for Striking Deviant Doctors from Birth Certificates,” published by N.Y. Daily News on 04/28/19, <https://www.nydailynews.com/news/politics/ny-pol-city-council-robert-hadden-birth-certificate-doctors-20190328-v6unj6tzyjfatconfeoqkpnehi-story.html>;
31. Attached hereto as **Exhibit 29** is a true and correct copy of an article “NYC Women

Are Getting Pervy Doctors' Names Deleted from Birth Certificates," published by Daily Beast on 01/16/20, <https://www.thedailybeast.com/nyc-women-are-getting-pervy-doctors-names-deleted-from-birth-certificates;>

32. Attached hereto as **Exhibit 30** is a true and correct copy of an article "New York Bill Would Give Adult Sexual Abuse Survivors Their Day in Court," published by WSKG on 05/12/21, [https://wskg.org/news/new-york-bill-would-give-adult-sexual-abuse-survivors-their-day-in-court/;](https://wskg.org/news/new-york-bill-would-give-adult-sexual-abuse-survivors-their-day-in-court/)
33. Attached hereto as **Exhibit 31** is a true and correct copy of an article "Cuomo Accuser Boylan, Other Survivors Back Bill to Take Alleged Abusers to Court," published by WSKG on 03/26/21, [https://wskg.org/news/cuomo-accuser-boylan-other-survivors-back-bill-to-take-alleged-abusers-to-court/;](https://wskg.org/news/cuomo-accuser-boylan-other-survivors-back-bill-to-take-alleged-abusers-to-court/)
34. Attached hereto as **Exhibit 32** is a true and correct copy of a news clip, "Sex abuse survivors speak out to support Adult Survivors Act," published by PIX11 on 06/07/21, <https://www.youtube.com/watch?v=It8BmVK6awE;>
35. Attached hereto as **Exhibit 33** is a true and correct copy of an article, "Donation to Cy Vance Jr. During Sex Assault Case Raises 'Yet Another Alarm Bell,'" published by CBS News on 10/20/17, [https://www.cbsnews.com/news/cy-vance-jr-donation-during-sex-assault-case-raises-yet-another-alarm-bell/;](https://www.cbsnews.com/news/cy-vance-jr-donation-during-sex-assault-case-raises-yet-another-alarm-bell/)
36. Attached hereto as **Exhibit 34** is a true and correct copy of an article, "My Abuser's Name Is on My Daughters' Birth Certificates & I Won't Rest Until It's Removed," published by Bustle on 11/29/18 <https://www.bustle.com/p/my-abusers-name-is-on-my-daughters-birth-certificates-i-wont-rest-until-its-removed-12605285;>
37. Attached hereto as **Exhibit 35** is a true and correct copy of a website page, "A Plan to

Create a High Quality, Victim Centered, Dedicated Sex Crimes Unit to Get Justice for Brave Survivors”, <https://www.alvinbragg.com/justice-for-survivors;>

38. Attached hereto as **Exhibit 36** is a true and correct copy of an article, “UES Gynecologist Accused of Sexually Abusing Pregnant Patients,” published by Gothamist on 06/19/14, <https://gothamist.com/news/ues-gynecologist-accused-of-sexually-abusing-pregnant-patients;>
39. Attached hereto as **Exhibit 37** is a true and correct copy of an article, “Andrew Yang, Eric Adams Neck and Neck in New Mayoral Poll,” published by N.Y. Post on 5/19/21 <https://nypost.com/2021/05/19/andrew-yang-eric-adams-neck-and-neck-in-new-mayoral-poll/;>
40. Attached hereto as **Exhibit 38** is a true and correct copy of an interview, “Evelyn Yang Reveals she was Sexually Assaulted while pregnant,” published by CNN on 01/16/20, <https://www.youtube.com/watch?v=wMbIQgCRtjw;>
41. Attached hereto as **Exhibit 39** is a true and correct copy of an article “Upper West Side gynecologist who admitted to sexually assaulting pregnant patients, loses license, dodges jail time,” published by New York Daily News on 02/24/16, <https://www.nydailynews.com/new-york/manhattan/nyc-gynecologist-assaulted-patients-loses-license-article-1.2541075;>
42. Attached hereto as **Exhibit 40** is a true and correct copy of a news clip, “Evelyn and Andrew Yang speak about Surge in Anti-Asian Violence,” published by ABC News on 03/20/21, <https://abcnews.go.com/2020/video/evelyn-andrew-yang-speak-surge-anti-asian-violence-76570513;>
43. Attached hereto as **Exhibit 41** is a true and correct copy of an article, “Doctor’s

controversial plea deal in sex abuse case came after suppressed evidence was found,” published by CBS News on 09/18/20, <https://www.cbsnews.com/news/robert-hadden-sex-abuse-case-da-suppressed-evidence-attorney-says/>;

44. Attached hereto as **Exhibit 42** is a true and correct copy of an article, “Pervert gynecologist got no jail deal after Manhattan DA withheld evidence,” published by NY Post on 09/17/20 <https://nypost.com/2020/09/17/pervert-gynecologist-got-no-jail-deal-after-da-withheld-evidence/>;
45. Attached hereto as **Exhibit 43** is a true and correct copy of an article, “More than 200 Accusers of Ex-Columbia University Gynecologist who Sexually Abused Patients Urge NY Lawmakers to give them Day in Court,” published by NY Daily News on 05/26/21, <https://www.nydailynews.com/new-york/manhattan/ny-exclu-200-robert-hadden-accusers-letter-ny-legislators-adult-survivors-act-20210526-qxdu7xegxjg3jah52u6yigrtpa-story.html>;
46. Attached hereto as **Exhibit 44** is a true and correct copy of a tweet by Anthony T. DiPietro Esq (@atdipietro) published on 06/11/21, <https://twitter.com/atdipietro/status/1403426398732271619> (last visited July 20, 2021);
47. Attached hereto as **Exhibit 45** is a true and correct copy of an article, “ New City Council bill would give victims of gender-based violence chance to sue,” published by NY Daily News on 7/29/20, <https://www.nydailynews.com/new-york/ny-city-council-gender-based-violence-bill-20210729-oqmljk73ivbb3omar2eus4dqfu-story.html>;
48. Attached hereto as **Exhibit 46** is a true and correct copy of a tweet, published by Alvin Bragg (@AlvinBraggNYC), on 07/17/19, <https://twitter.com/AlvinBraggNYC/status/1151477413748072449>;

49. Attached hereto as **Exhibit 47** is a true and correct copy of a webpage, published by Dan Quart, <https://danquart.com/action/sex-crimes>, last accessed July 18, 2021;
50. Attached hereto as **Exhibit 48** is a true and correct copy of a website page, “Janos Marton calls for Resignation of Manhattan District Attorney Cy Vance,” published by Janos Marton, on 01/21/20, <https://janosforda.medium.com/janos-marton-calls-for-resignation-of-manhattan-district-attorney-cy-vance-7210bf3e4db2>;
51. Attached hereto as **Exhibit 49** is a true and correct copy of the press release, “DA Candidate Florence Releases 2021 State Legislative Priorities,” published by Diana Florence, on 01/06/20, <https://dianaforda.com/news/da-candidate-florence-releases-2021-state-legislative-priorities/>;
52. Attached hereto as **Exhibit 50** is a true and correct copy of the website page, “A Modern Approach to Sex Crimes Prosecution,” published by Mimi Rocah, <https://www.mimirocahforda.com/a-modern-approach-to-sex-crimes-prosecution>;
53. Attached hereto as **Exhibit 51** is a true and correct copy of an article, “Sexual Assault Survivor Launches Campaign help Unseat Vance, Seek more DA Transparency,” published by Politico, on 10/23/19, <https://www.politico.com/states/new-york/albany/story/2019/10/22/sexual-assault-survivor-launches-campaign-to-help-unseat-vance-seek-more-da-transparency-1225894>;
54. Attached hereto as **Exhibit 52** is a true and correct copy of an article, “A story unearthed during the #MeToo movement could change New York law to make victims’ lives easier,” published by ThinkProgress on 12/19/18,

<https://archive.thinkprogress.org/robert-hadden-new-york-metoo-birth-certificate-sexual-assault-52c95c99a543/>;

55. Attached hereto as **Exhibit 53** is a true and correct copy of an article “Step up for sex abuse victims, N.Y.,” published by NY Daily News, on 05/05/20, <https://www.nydailynews.com/opinion/ny-oped-step-up-for-sex-abuse-victims-ny-20200505-zu4qvc46ynhfng4pxtq3tmctti-story.html>;
56. Attached hereto as **Exhibit 54** is a true and correct copy of an article, “17 women sue Columbia University, its hospital, claim “massive coverup” of doctor’s sex abuse,” published by CBS News on 12/05/18, <https://www.cbsnews.com/news/columbia-university-hospital-doctor-robert-hadden-sexual-abuse-lawsuit/>;
57. Attached hereto as **Exhibit 55** is a true and correct copy of an article, “175 women alleged sexual abuse against a Columbia gynecologist. Five years after his conviction, they’re still fighting to be heard,” published by Columbia Spectator on 03/26/21;
58. Attached hereto as **Exhibit 56** is a true and correct copy of an article, “N.Y.C. Gynecologist Faces Federal Charges Over 6 Sex Abuse Accusations,” published by N.Y. Times, on 09/09/20, <https://www.nytimes.com/2020/09/09/nyregion/robert-hadden-gynecologist-indicted.html>;
59. Attached hereto as **Exhibit 57** is a true and correct copy of a tweet published by US Attorney SDNY (@SDNYnews), on 09/09/20, <https://twitter.com/SDNYnews/status/1303747911432499203>;
60. Attached hereto as **Exhibit 58** is a true and correct copy of an article, “Ex Gynecologist Accused of Sexually Abusing Dozens of Female Patients faces New Challenges,” published by CBS News on 07/19/21,

<https://www.cbsnews.com/news/robert-hadden-gynecologist-sexual-abuse-new-charge-child-porn/>;

61. Attached hereto as **Exhibit 59** is a true and correct copy of a tweet published by @MHoechstetter on 07/21/21,
<https://twitter.com/LindaBRosenthal/status/1417939141879345154>;
62. Attached hereto as **Exhibit 60** is a true and correct copy of an article, “NYC Gynecologist Robert Hadden facing federal sex abuse charges,” published by Politico on 09/09/20, <https://www.politico.com/states/new-york/albany/story/2020/09/09/nyc-gynecologist-robert-hadden-facing-federal-sex-abuse-charges-9424107>;
63. Attached hereto as **Exhibit 61** is a true and correct copy of an article, “Sex-abuse survivors, activists decry,” published by Hudson Valley360, on 06/14/21,
https://www.hudsonvalley360.com/news/nystate/sex-abuse-survivors-activists-decry-inaction/article_e33e93c7-82ae-525e-8084-ec0ccc44b7de.html;
64. Attached hereto as **Exhibit 62** is a true and correct copy of an article, “Charge that Maxwell ‘Groomed’ Girls for Epstein Is Central to Case,” published by N.Y. Times on 12/28/20, <https://www.nytimes.com/2020/09/17/nyregion/ghislaine-maxwell-grooming.html>;
65. Attached hereto as **Exhibit 63** is a true and correct copy of an article, “Columbia University Under Investigation for Mr. Robert Hadden Accusations,” published by Top Class Actions, on 11/30/20, <https://topclassactions.com/lawsuit-settlements/sexual-assault-abuse/dr-robert-hadden-gynecologist-abuse/>;
66. Attached hereto as **Exhibit 64** is a true and correct copy of the webpage, “Child

Victims Act – Sue Dr. Robert Hadden,” published by Wittenstein,

<https://www.wittenstein.com/child-victims-act-sue-dr-robert-hadden/>;

67. Attached hereto as **Exhibit 65** is a true and correct copy of the press release, “Former Obstetrician/Gynecologist Robert Hadden Charged in Manhattan Federal Court with Sexually Abusing Patients,” published by United States Attorney’s Office SDNY on 09/09/20, <https://www.justice.gov/usao-sdny/pr/former-obstetriciangynecologist-robert-hadden-charged-manhattan-federal-court-sexually>;
68. Attached hereto as **Exhibit 66** is a true and correct copy of a Letter from AUSA Jane Kim et al. to Deirdre D. von Dornum, dated 05/07/21 [filed under seal];
69. Attached hereto as **Exhibit 67** is a true and correct copy of a Letter from AUSA Jane Kim et al. to Deirdre D. von Dornum, dated 07/21/21 [redacted copy filed on ECF];
70. Attached hereto as **Exhibit 68** is a true and correct copy of a Letter from Isabelle Kirshner to Hon. Ronald Zweibel, dated 03/27/15 (SDNY_RH_00000347, at SDNY_RH_00000357);
71. Attached hereto as **Exhibit 69** is a true and correct copy of a Letter from AUSA Jane Kim et al. to Deirdre. D. von Dornum, dated 05/20/21 [redacted copy filed on ECF];
72. Attached hereto as **Exhibit 70** is a true and correct copy of an Email from Jennifer Gaffney to Isabelle Kirshner & Wayne Gosnell, dated 2/11/16, published at ECF No. 19;
73. Attached hereto as **Exhibit 71** is a true and correct copy of a Letter from Helen V. Cantwell to Jessica Lonergan et al. dated 06/03/21 (SDNY_RH_00058599, at SDNY_RH_00058599-00058600) [filed under seal];
74. Attached hereto as **Exhibit 72** is a true and correct copy of the Government Discovery Letter dated 07/21/21 [redacted copy filed on ECF];

75. Attached hereto as **Exhibit 73** is a true and correct copy of the Declaration of Isabelle Kirshner.

Dated: August 2, 2021
Brooklyn, NY



Deirdre D. von Dornum